

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)**

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Local Counsel for the Plan Administrator

In re:

BLOCKFI INC., *et al.*,

Wind-Down Debtors.¹

Adv. No.: 23-01175

Case No.: 22-19361 (MBK)

Judge: Hon. Michael B. Kaplan

Chapter: 11

Subchapter V: ☐ Yes ☒ No

ADJOURNMENT REQUEST

1. I, Donald W. Clarke, Esq.

☒ am the attorney for: the Plan Administrator and Plaintiffs,

☐ am self-represented,

and request an adjournment of the hearings on the following matters for the reason set forth below.

- i. *BlockFi International Ltd.'s Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Holding Vrai Nom in Contempt and Imposing Sanctions for Willful Violations of the Automatic Stay and (III) Granting Related Relief* [Docket No. 1330].
- ii. *Letter Brief in Opposition to BlockFi International Ltd.'s Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Holding Vrai Nom in Contempt and*

¹ The Wind-Down Debtors in these chapter 11 cases, along with the last four digits of each Wind-Down Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is: c/o M-3 Partners LP, 1700 Broadway, 19th Floor, New York, NY 10019.

*Imposing Sanctions for Willful Violations of the Automatic Stay and (III)
Granting Related Relief* [Docket No. 1495]

iii. Pre-Trial Hearing in Adversary Proceeding No. 23-01175 (MBK).

Current hearing date and time: December 19, 2023, at 10:00 a.m. (ET)

New date requested: January 16, 2024, at 10:00 a.m. (ET)

Reason for adjournment request: The parties respectfully request that the Court adjourn the hearing on the matters set forth above to January 16, 2023, to permit the parties additional time to finish documenting their settlement agreement. Pursuant to D.N.J. LBR 9013-2(a)(3), Vrai Nom has agreed to allow the Plan Administrator until January 10, 2023, to file a reply. All other rights of the parties are reserved.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: December 15, 2023

/s/ Donald W. Clarke

Signature

COURT USE ONLY:

The request for adjournment is:

- ☒ Granted New hearing date: January 16, 2024 at 10:00 am ☐ Peremptory
- ☐ Granted over objection(s) New hearing date: _____ ☐ Peremptory
- ☐ Denied

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.